

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO.: 1:22-cv-21004-DPG

JESSICA GUASTO,

Plaintiff,

vs.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality, et al.

Defendants.

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INITIAL DISCLOSURES OF PLAINTIFF GUASTO

COMES NOW, Plaintiff Jessica Guasto, by and through the undersigned attorney, pursuant to Rule 26 of the Federal Rules of Civil Procedure, and submits the following initial disclosures:

1. R. 26(a)(1)(A)(i): Individuals Likely to Have Discoverable Information

The following are the names and, if known, the addresses and telephone numbers of each individual likely to have discoverable information that Defendant may use to support his position, unless solely used for impeachment, identifying the subjects of the information.

- a. Jessica Guasto, Plaintiff: Knowledge regarding discriminatory actions by the City of Miami Beach management; facts of this case and employment history. Contact information c/o undersigned's office.
- b. Nicholas Guasto: knowledge of matter which led to Plaintiff's termination by Defendant City of Miami Beach. Contact information c/o undersigned's office.
- c. Robert Jenkins: facts of this case; labor and disciplinary history of MB police employees. Contact information c/o undersigned's office.
- d. All persons referenced in the documents listed in section 2 below.

- e. Any witnesses listed by the Defendants.
- f. All persons named in all Rule 26 Disclosures.
- g. Other persons who become known through discovery.

2. **R. 26(a)(1)(A)(ii): Relevant Documents in Plaintiff's Possession**

The following is a description by category and location of all documents, data compilations, and tangible things that are currently in Plaintiff's possession, custody, or control and the Plaintiff may use to support his claims or defenses, unless solely used for impeachment:

- a. Electronic mail communications between Plaintiff and Defendant.
- b. Documents in Plaintiff's personnel file.
- c. Plaintiff's performance reviews while employed by MB.
- d. Screenshots of text messages between Plaintiff and MB employees.
- e. Written communications between Plaintiff and Defendant Cosner.
- f. Settlement documents in previous disciplinary and EEOC matters between Plaintiff and Defendant MB.
- g. Upon receiving discovery responses from the Defendant, the Plaintiff may identify additional witnesses or documents regarding his claims. This disclosure does not waive the Plaintiff's right to call impeachment witnesses not listed herein.

3. **R. 26(a)(1)(A)(iii): Computation of Damages**

To be determined by a jury.

4. **R. 26(a)(1)(A)(iii): Insurance Agreements**

None.

SUPPLEMENTATION

These initial disclosures are made in good faith and are based on information that is, at this time, reasonably available to Plaintiff. Additional witnesses and/or documents may subsequently be identified as relevant to this matter. Thus, these initial disclosures may not contain the entire list of witnesses and/or documents that Plaintiff may ultimately identify for use in this action. Plaintiff will supplement these disclosures, as necessary, should additional witnesses and/or documents be identified for use in this case.

Respectfully submitted,

PAUL DARAGJATI PLC

/s/ Paul A. Daragjati

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on Thursday, January 05, 2023, I furnished the foregoing via electronic mail to the below listed entities:

SERVICE LIST

Case No. 22-cv-21004-DPG

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